



Victor E. Lindenheim  
President

July 15, 1991

Mr. Spencer Duffy  
Office of Pesticides & Reregistration  
U.S. Environmental Protection Agency  
Crystal Station #1, 3rd Floor  
2800 Jefferson Davis Highway  
Arlington, Virginia 22202

Dear Mr. Duffy:

Once again, I would like to thank you for meeting with representatives of the American Wood Preservers Institute to discuss the wood preserving industry's Voluntary Consumer Awareness Program (VCAP).

A. Summary of May 30, 1991 Meeting Between EPA and AWPI. Your June 14 summary of our May 30, 1991 meeting between EPA and AWPI is a reasonably accurate account of what transpired. The key points of agreement, drawn from your memo and my notes of the meeting follow.

1. The 1985 Settlement Agreement required a one-time initial compliance audit of the VCAP, to be conducted by an independent EPA-approved contractor/auditor. That audit was conducted in 1986 and the results were submitted to EPA, as agreed. The settlement agreement also called for subsequent voluntary compliance surveys which the industry could conduct itself, using generally accepted statistical methods. AWPI has cooperated fully with EPA, going beyond what was contemplated in the Settlement Agreement regarding such compliance surveys. While the compliance surveys have served their purpose, it is clear that, in their original form, they have outlived their usefulness:
  - a) The surveys indicate that compliance levels among wood preserving pesticide suppliers has been at or near 100% for five consecutive years.
  - b) The surveys indicate that the Voluntary Consumer Awareness Program was not as successful in informing the consumer of proper treated wood product handling, use and disposal precautions.
  - c) AWPI believes that the results of future similar surveys, if conducted, would not change significantly, and therefore, would yield no new information and not address existing program deficiencies.
2. The annual compliance survey is expensive relative to AWPI's total annual operating budget. The contractor's 1991 proposal would have cost \$107,000, which is approximately 10% of AWPI's annual budget. In addition, the implementation costs for staffing, administration, and documentation for any future audits would be borne exclusively by AWPI, since the Society of American Wood Preservers is now defunct.
3. AWPI would prefer to focus its limited resources on a VCAP geared to developing and delivering sound, useful information to the consumer in the home and garden setting, where there appears to be the greatest need.

American Wood Preservers Institute

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B. Expanded Voluntary Consumer Awareness Program. In addition to confirming and clarifying our understanding of what transpired at the meeting, AWPI had agreed to provide an outline of the key elements of an expanded Voluntary Consumer Awareness Program that would meet two objectives: improve the flow of consumer information about treated wood to the consumer; and satisfy the provisions of the settlement agreement. Following is a preliminary outline and description of the program I have in mind:

1. Data and Information Resource Consolidation and Development.
  - a) conduct literature search on existing technical data; screen for validity, currency and utility; consolidate, organize and catalog; maintain and update as appropriate.
  - b) establish a council of technical experts on treated wood products and wood preserving pesticides (including e.g., wood scientists, toxicologists from academia and industry) to serve as a peer review body and as an active technical information resource.
  - c) monitor and include new information and data (e.g., data call-in, reregistration data).
2. Information Dissemination.
  - a) develop a summary "white paper" resource on environmental, health and safety aspects of pressure-treated wood products and wood preserving pesticides.
  - b) implement an outreach program consisting of publications, videos, print media articles, interviews, lectures, etc.
  - c) consider establishing a treated wood products consumer information hotline.
3. Measuring Program Effectiveness.
  - a) survey retailers and wholesalers to better understand why deficiencies exist in the current VCAP.
  - b) develop methods and mechanisms to provide audience feedback on future VCAP program elements.

Mr. Duffy, please recognize that this is an ambitious program that would go beyond the scope of the Voluntary CAP and continue beyond 1991. Expectations of results and measurement of such a program's effectiveness should be considered carefully in that context.

C. Next Steps.

- a) EPA will get back to AWPI with its recommendations regarding the proposed expanded VCAP outlined in this letter within 15 days of receipt.
- b) After receiving EPA's recommendations AWPI will pursue development of an expanded VCAP. It is our intention to submit to EPA for further comment a more detailed outline of the expanded VCAP within 60-90 days of receiving EPA's written recommendations.

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- c) EPA's full wood preservative team will consider AWPI's proposal to defer the survey until it (AWPI) has met with wood treaters/suppliers to develop a survey format and method for 1991 that is acceptable to both EPA and the industry.

I look forward to hearing from you. In the meantime, if you have any questions or would like to discuss any aspects of the VCAP, please contact me directly. I am optimistic that a productive information program can be implemented that will meet the needs of the Agency, the wood preserving industry and most important, the users of treated wood products.

Sincerely,



Victor E. Lindenheim

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cc: L. Ebner

